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7 *Attorneys for Defendant*  
 8 *JPMorgan Discover Bank, NA*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 Dawn Nelson,

12 Plaintiff,

13 v.

14 Discover Bank, TransUnion, LLC;  
 Experian Information Solutions, Inc.; and  
 15 Equifax Information Services, LLC.,

16 Defendants.

Case No. 2:22-cv-01217-MMD-DJA

**Unopposed Motion and Proposed Order to  
 Extend Time for Discover Bank to  
 Respond to Plaintiff's Complaint**

**(Third Request)**

17  
 18 The response of defendant Discover Bank ("Discover") to plaintiff Dawn Nelson's  
 19 complaint (ECF No. 1) is due September 26, 2022. Discover has requested, and  
 20 plaintiff has agreed, that Discover have up to and including October 5, 2022, to respond  
 21 to plaintiff's complaint to provide additional time for the Parties to continue to work  
 22 toward a possible settlement.

23 Although Ms. Nelson's national counsel has agreed to the extension, local  
 24 counsel could not be reached in time to authorize the filing of a joint motion, which is  
 25 why this request is styled as an unopposed motion. However, Ms. Nelson's national  
 26 counsel represents that she does not intend to oppose this request. Discover asserts  
 27 that there is good cause under Fed. R. Civ. P. 6(b)(1) to extend this deadline, given the  
 28 parties' ongoing settlement efforts.

1 This is the third request for an extension, and it is made in good faith and not  
2 for purposes of delay.

3 Dated: September 26, 2022

4 BALLARD SPAHR LLP

5 By: /s/ David E. Chavez

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12 *Attorneys for Defendant*  
13 *Discover Bank*

14 **ORDER**

15 IT IS SO ORDERED:

16   
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18  
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: September 27, 2022  
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**CERTIFICATE OF SERVICE**

I certify that on September 26, 2022, and pursuant to FRCP 5, a true copy of the foregoing Joint Motion to Extend Time was filed via the Court's CM/ECF System and electronically served by the Court on all parties.

/s/ David E. Chavez  
An employee of Ballard Spahr

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